



stonefort
Complaints
Handling
Policy

Content

- 1. Background..... 1
- 2. Definition of a Complaint..... 1
- 3. Categorization of Complaints..... 1
- 4. Handling Complaints..... 2
- 5. Record Keeping..... 3
- 6. Redress..... 3

1. Background

Stonefort Securities Ltd (“the Company”) aims to deal with all complaints in a prompt and reasonable manner, ensuring that the client is made aware of the person dealing with the issues raised, and adherence to these procedures will ensure a consistent approach. The client will be updated on the progress made toward resolving the complaint (see section 1.4 below).

A copy of this Complaints Handling Procedure should be made available to the client on request.

2. Definition of a Complaint

The definition of a complaint is any expression of dissatisfaction from an eligible complainant, made either orally or in writing, whether justified or not.

3. Categorization of Complaints

A client may complain about a number of reasons. Any complaint received must be investigated by an employee with sufficient competence who, where appropriate, was not directly involved in the matter that is subject to the client's complaint.

When dealing with a complaint it is important to understand the jurisdiction where the regulated activity occurred against which the client is complaining.

Any complaints in this respect must be dealt with by the Compliance Officer. Full details of the complaint must be emailed to the Compliance Officer. The responsibility of ensuring all complaints is handled efficiently rests with the Compliance Officer and reporting of all complaints must be made to the Chief Executive Officer of the Company.

Complaint Category Person/Area Responsible

- Unsuitable/misleading advice/ ‘churning’;
- Delays and other administrative errors;
- Failure to carry out instructions - (that has, or may, directly or indirectly lead to a financial loss for the client);
- Switching/Churning;
- Poor client service; and
- Misleading product information.

4. Handling Complaints

a) Initial Receipt

- When a complaint is received on our official compliant email **complaint@stonefortsecurities.com**, full details must be passed to the person responsible within 24 hours of receipt.
- If the complaint is made over the telephone, you must obtain as much details as possible before passing the notes from the conversation and other relevant information to the person responsible.

b) Acknowledgement of the Complaint

Unless the complaint is of a 'simple nature' and can be resolved within 24 hours, a letter/email acknowledging the complaint must be sent within 24 hours of receipt. The letter should show the following:

- * The name and job title of the person now dealing with the complaint;
- * Their contact details; and
- * Expected timescale (if possible) to resolve the complaint and when the client can expect to receive an update on progress.

c) Further Timescales

If the complaint has not been resolved within 3 weeks, then a further letter should be sent to the client stating:

- The present position with regard to the investigation into the complaint; and
- An estimation (if possible) of how long it will take to bring matters to a conclusion.

Note – The above represents the minimum business standards. It is expected that the client will be contacted more frequently as appropriate given the nature of the complaint made.

d) Investigation of the Complaint

To enable the complaint to be addressed as soon as possible, the areas involved in both the sale and processing of the business may be asked to provide information and/or a report on the matter. These requests must be given priority. This will enable the complaint to be addressed appropriately.

e) Investment Performance

A complaint about investment performance is not viewed as a 'regulatory complaint'. Where 'complaints' of this nature are received from a client, they should be dealt with by an appropriate adviser. Where it is clear that other issues are involved (as well as 'investment performance') then the case file should be dealt with in accordance with the above.

5. Record Keeping

All complaints received must be recorded on an internal database. The Compliance Officer will maintain a database of all referred complaints and should also maintain accurate records.

- It assists the business in meeting its applicable regulatory requirements;
- It enables the business to monitor the number of complaints being received;
- Any consultants that may require any additional training or coaching can be identified to ensure that they can meet the required business standards in the areas of advice, client servicing etc., and
- Any amendments that may be required for internal procedures arising from the number of recorded complaints can be identified.

Maintenance of internal record-keeping will be monitored by compliance on an ongoing basis.

6. Redress

Where redress is appropriate, any sum paid should aim to provide fair and reasonable compensation for any acts or omissions for which we are responsible and comply with any offer of redress which the complainant accepts.

No compensation may be paid unless prior sign-off has been obtained from the directors of the Company.

If a client is not happy with the complaints redress and assessment, the client shall be shared the details of the Mauritius Financial Services Commission and the Ombudsperson for financial services in Mauritius for further notifications. <https://eservice.govmu.org/form/ombudsman/complaint.php>

Process

When communicating the level of redress to the client, an explanation should be provided on how the amount to be paid has been determined. The letter to be sent to the client must include the attached declaration for the client to sign and return. This declaration is a 'full and final settlement' document and will be provided on request. This is because the exact wording may vary slightly depending on the circumstances of the complaint.

The payment of any redress cannot take place until the signed declaration has been returned by the client.

Employee Awareness

All relevant employees must be aware of our complaint handling procedures. A copy will be provided to advisers during their induction program and no later than sign off to full, competent adviser status.



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